

# EXHIBIT 20

**Deposition of Clifton Mitchell**

**Pages: 14, 77**

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**Dated: March 25, 2021**

1     Abbey Cassidy, Dr. Abbey Cassidy, who, to my  
2     understanding, is the director of the mental  
3     health unit of the prison.

4 Do you see here Dr. Cassidy's  
5 reference to the fact that Deputy Warden  
6 Mitchell, meaning you, made a request to check  
7 Mr. Freitag? Is that a yes?

8 A Yes.

9 Q All right. Do you remember, sir,  
10 having a conversation with Dr. Cassidy about Mr.  
11 Freitag?

12 A I remember that I contacted her after  
13 Paul Lang contacted me.

14 Q Okay. And just to complete the  
15 circle on that, I'll show you that -- a document  
16 that we all received in the past week. This is  
17 marked as Exhibit P-24. Do you have that in  
18 front of you, sir, P-24?

19                   A         Hold on a second. It starts with  
20 please be advised? What is the --

21 Q Yeah. I'm going to scroll up, and --  
22 MR. KOLANSKY: Mr. Mitchell, if I can  
23 interrupt you? I apologize. I think when Mr.  
24 Feinberg is asking a specific question, listen to  
25 the question, like I have said before.

1 in their possession?

2 A Well, I didn't.

3 Q Right. And --

4 A And I was the one referring it to  
5 them from the standpoint of, you know, you talked  
6 about his mental health and the suicides.

7 Q Right. So you didn't. And  
8 obviously, we, as lawyers in this case, we have  
9 access to all of the information, which you did  
10 not have at that time. So just to confirm, you  
11 didn't know that he had two prior suicide  
12 attempts; is that correct?

13 A Correct.

14 Q You did not know that one of his  
15 suicide attempts was what, in fact, led to his  
16 arrest, prosecution, conviction and  
17 incarceration; is that correct?

18 A Correct.

19 MR. KOLANSKY: Objection to form.

20 BY MR. FEINBERG:

21 Q You did not know that he had been  
22 expressing, for weeks, anxiety about his  
23 sentencing; is that correct?

24 A No.

25 Q You did not know anything about what